

Jxm

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

RECEIVED

FEB 13 2024 EW

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Dante Rodgers 2023121109

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

24-cv-1281

Judge Ellis

Magistrate Judge Jantz
RANDOM/CAT 3/PC 2

R. Ramirez

X Saldana

R. Rivera 06

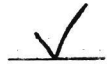
A. Lumpkins

S. Hinesoz

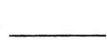
Tom dart

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:



COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)



COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)



OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

page 1 of

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

I. Plaintiff(s):

- A. Name: Dante Rodgers
- B. List all aliases: _____
- C. Prisoner identification number: 20231211109
- D. Place of present confinement: Cook County Jail
- E. Address: 2700 S California Ave. Chicago, IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: R. Ramirez
Title: Correctional officer
Place of Employment: Cook County Jail
- B. Defendant: X Saldana
Title: Correctional officer
Place of Employment: Cook County Jail
- C. Defendant: R. Rivera 06
Title: Correctional officer
Place of Employment: Cook County Jail

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

D. Defendant: A Lumpkins

Title: correctional officer

Place of Employment: Cook county jail

E. Defendant: S. Hines 02

Title: correctional officer

Place of Employment: Cook county jail

f. Defendant: Tom dant

Title: sHeriff of cook county

Place of Employment: cook county jail

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: N/A
- B. Approximate date of filing lawsuit: N/A
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A
- D. List all defendants: N/A
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): N/A
- F. Name of judge to whom case was assigned: N/A
- G. Basic claim made: N/A
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): N/A
- I. Approximate date of disposition: N/A

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On Jan 5, 2024 a detainee became extremely agitated. The detainee name is Kenneth Carter. He first got into it with another inmate. Then me Kenneth Carter was acting extremely agitated with everyone that day. He even yelled at defendant Rivera and stated "Get this nigger off the deck before I kill him with his nappy head as I think he got bugs in his hair while he talking." I asked defendant Rivera to call a sergeant because this guy always trying to fight. Rivera started "All he did was threaten you plus y'all getting a shake down any way." Shortly Carter walked towards me and Rivera. Just looked at him, Carter started attacking me and Rivera was unable to assist me because he did not have backup. Shortly defendants Ramirez, Figueroa, X Saldana, Lumpkins and Hines, came in. Carter refused to let me go. Ramirez and X Saldana pulled us apart. Once I was pulled apart, I followed all the officers' orders and both officers slammed my face on top of the

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

metal table I busted my mouth and chapped my
 tooth I went to medical told the nurse that I had a
 sore face plus my teeth hurt in my head was hurting
 really bad the nurse did not do any thing or ^{she} did not
 even give me any medication to help the pain ^{also} being
 cuffed defendants Ramirez and Saldana nearly broke
 my wrist defendants Rivera, Alumpkis and Hines
 also so refused to give me medical attention when I started
 to see how they just did me my wrist hurt please let me
 see the nurse again there ^{are} suppose to be 1 officer
 per fifteen detainees, the tier had 39 detainees with
 one officer where is how I was being attacked until Rivera's
 backup arrived. Inadequate security played a major
 role in me being attacked Rivera seen Carter agitated
 and refused to stop him after he had the knowledge
 of Carter threatening to kill me

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

The court to order The ^{county} ~~GO~~ to have adequate security/
adequate compensation

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 2 - 6 day of 6, 20 24

Dante Rodgers
(Signature of plaintiff or plaintiffs)

Dante Rodgers
(Print name)

20231211109
(I.D. Number)

2700 S. California Ave.
Chicago, IL 60608
(Address)

Legal mail

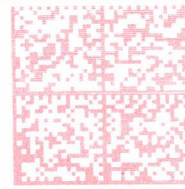
Dante Rodgers

Div 8 RTU

Tier 4D

2700S. California Ave

Chicago, IL 60608



quadient

FIRST-CLASS MAIL

IMI

\$002.35⁰⁰

02/06/2024 ZIP 60608
043M31244814

U.S. POSTAGE

24-cv-1281
Judge Ellis
Magistrate Judge Jantz
RANDOM/CAT 3/PC 2



02/13/2024-4

United States
District court
219 S. Dearborn
Chicago, IL 60604

Legal mail